

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA

1:23-cv-01228-JRS-MG

**FILED**

**02/09/2024**

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Roger A.G. Sharpe, Clerk

-----X  
D. G. SWEIGERT

Plaintiff,

-against-

JASON GOODMAN et al  
Defendant.  
-----X

**MEMORANDUM IN  
SUPPORT OF MOTION  
SEEKING LEAVE TO FILE A  
COUNTERCLAIM**

Defendant-counterclaimant Jason Goodman, (“Goodman”) by and for himself pro se, respectfully submits this memorandum in support of the motion seeking leave to file a counterclaim pursuant to FRCP Rule 13(b) for the reasons stated below;

**INTRODUCTION**

1. Plaintiff Sweigert is an obsessed cyber stalker and serial harasser who has pursued Goodman continuously since 2017. He is an apparent disgruntled viewer of Goodman’s show who has never met Goodman and has no legitimate purpose for interacting with Goodman.

2. Sweigert has worked to systematically destroy Goodman’s income by disrupting his business relationships and making false complaints to law enforcement, various government agencies, and social media companies in addition to burdening Goodman with frivolous lawsuits.

3. In July 2023, Sweigert began to abuse the judicial resources of the Southern District of Indiana for his own personal, bad faith, ulterior purpose of harming Goodman.

4. Because the plaintiff has failed to follow the Court’s order, (Dkt. 45) and has not filed a properly plead complaint, the defendant is left with this option only to file a counterclaim.

5. Because there is no operative complaint to answer, Goodman now seeks leave to file a permissive counterclaim pursuant to FRCP Rule 13(b). Goodman’s claims do not arise from the same occurrences as plaintiff’s but rather from new concurrent statements and actions.

6. This honorable Court had ordered the vexatious plaintiff to file a concise amended complaint on or before 4:00 p.m. Friday, February 02, 2024, but he chose not to comply.

7. Goodman now respectfully moves the Court for an order granting leave to file the accompanying proposed counterclaim even though no cognizable complaint and no responsive answer have been filed as yet, and for any other appropriate relief as determined by the Court.

Dated: New York, New York February 9, 2024

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Goodman', with a long horizontal stroke extending to the right.

Jason Goodman  
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